

Paralegal PERSPECTIVES

Trial preparation tips that every paralegal should know

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Having a case go to trial can be an extremely stressful and chaotic time for attorneys and their support staff. Taking early steps to prepare and organize well in advance of a trial will save you from many panicked moments later.

Organize a meeting with any attorneys and support staff involved in the trial

Every trial and lead attorney are different; I like to schedule meetings well in advance of the start date to talk about the expectations and needs for that particular trial. Having a meeting to discuss the attorney's expectations and objectives creates a clear picture of the paralegal's responsibility for the duration of the trial. Prior to the meeting, preparing an agenda or quick outline will help keep the group on track and focused, and don't be afraid to schedule more than one meeting because there is likely a lot of information to cover. I strongly feel that having a productive first meeting can really set the tone for a smooth trial. Some of the topics that should be covered in this meeting are:

- Trial deadlines and tasks to be completed;
- Trial notebooks;
- Witness and expert preparation and coordination;

- Any travel arrangements; and
- Technology (what is available and what is needed).

Paralegals are expected to act as a project manager for trials. Staying as organized as possible through lists, charts and logs are key in trial preparation. Keeping a record of who is completing what task and when it is completed will help things not fall to the wayside.

Have a good understanding of the technology needed to present your case

The very last thing you want to do is show up to a courtroom and realize all the technology you thought would be there isn't. Always call the court ahead of time and verify what is available and not available. This goes hand in hand with the availability of your firm's technological resources. Does your firm have the projector you need to use, what about a screen for that projector, or has someone already reserved items that you need for another matter? It's extremely important to itemize and reserve every piece of equipment you will need. If certain equipment is needed that the firm does not own, or is not willing to buy, get in contact with a reputable vendor.

Clear communication is a top priority

There is nothing worse than a trial

derailed by miscommunication between an attorney and paralegal or another party involved in the trial. Periodically updating the attorney or other team members to the status of not only your tasks, but your other team members' tasks, will help keep the lines of communication open. Don't be afraid to ask for immediate clarification of tasks or responsibilities that you are to complete. The longer you wait to speak with the attorney, the more likely you are to duplicate work or re-do a project. Often the paralegal is the coordinator for the many people involved in the trial, and creating a master contact list can save you a lot of grief as the trial goes on. Typically, our firm compiles a contact list of attorneys, support staff, experts, witnesses, clerks and anyone else that may be involved in the case.

Organization, preparedness and an eye for detail are key

Paralegals are expected to act as a project manager for trials. Staying as organized as possible through lists, charts and logs are key in trial preparation. Keeping a record of who is completing what task and when it is completed will help things not fall to the wayside. Don't be afraid to follow up and check the status of your attorney's tasks; you can never assume someone is on track to com-

plete assignments. Make sure you are prepared with all of the supplies you think you will need for trial, and make a point to ask the attorney if they have any specific preferences. Due to the increased and constant pressure that trials bring on, be mindful that many people are bound to make more mistakes than normal. Nothing is more embarrassing than a misspelled name or swapped or missing exhibits in a motion, and the attorney will rely heavily on the paralegal to be able to catch those mistakes. Also take the opportunity, if you are unfamiliar with the court,

to ask for a tour of the courthouse and court room where the trial will take place. This will allow you to offer advice and ideas to the attorney on meeting places, technological capabilities and placement of demonstratives.

Don't be afraid to get more involved and offer opinions

Trials are stressful and incredibly time consuming, but that doesn't mean other cases stop for a trial. Much of the team will be overworked and stressed out, but don't be afraid to offer assistance. You should

be very clear about the tasks that you would be comfortable taking on, and if attorneys are able, will gladly send those tasks your way. I've sometimes found that paralegals are shy in offering opinions on anything from case presentation ideas, courtroom technology, to something as small as the best place for a quick lunch during trial. In my experience, an attorney is typically grateful when a paralegal shares a more efficient idea or a helpful suggestion.

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